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Attorney for (Party's name)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

<p>Plaintiff(s),</p> <p>vs.</p> <p>Defendant(s).</p>
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Case No.

**SCHEDULING AND PLANNING
CONFERENCE REPORT**

- I. **Meeting.** In accordance with Rule 26(f), Federal Rules of Civil Procedure, a meeting was held on (Date) and was attended by:
(Insert attorney's names and parties represented).
As a result of that meeting, the parties recommend the following:
- II. **Disclosures.**
- A. The information required by Fed. R. Civ. P. 26(a)(1):
1. ☐ Has been exchanged by the parties.
 2. ☐ Will be exchanged by the parties on or before (Date).
- B. Preliminary witness lists:
1. ☐ Have been exchanged by the parties.
 2. ☐ Will be exchanged by the parties on or before (Date).

III. **Discovery Plan.** The parties jointly propose the following discovery plan:

- A. Are there issues about preserving discovery information?
_ Yes _ No (If yes, please identify issues).
- B. Disclosure or discovery of electronically stored information should be handled as follows: (Description of parties' proposal).
- C. Claims of privilege or of protection of trial preparation materials:
 - 1. _ There is no indication that this will be an issue.
 - 2. _ The parties have entered into a confidentiality agreement.
 - 3. _ The parties will submit their proposed confidentiality agreement on or before: (Date).
- D. Disclosure of expert reports:
 - 1. _ By all parties on or before: (Date); or
 - 2. _ By plaintiff(s) on or before: (Date); and by defendant(s) on or before: (Date).
 - 3. _ Rebuttal reports on or before 30 days after service of the report being rebutted.
- E. Supplementation of disclosures and discovery responses under Fed. R. Civ. P. 26(e):
 - 1. _ At intervals of (Number) days; and final supplements will be served 60 days before the close of fact discovery.
 - 2. _ As new information is acquired, but not later than 60 days before the close of fact discovery.
- F. A final witness list disclosing all lay and expert witnesses whom a party may wish to call at trial will be served and filed on or before: (Date).¹
- G. Time for completing discovery:
 - 1. _ Fact discovery will be completed on or before: (Date); and expert discovery will be completed on or before: (Date); or

¹ This date may be more than but not less than 45 days prior to the close of discovery. Only those witnesses disclosed on that final witness list will be permitted to testify at trial, unless otherwise ordered for good cause shown.

2. — All discovery will be completed on or before: (Date).

In either case, the proposed discovery completion date should be no later than nine months from the date of this report, absent exceptional circumstances. If the parties agree that additional time for discovery will be necessary for this particular case, please explain: (Explanation). The Court may schedule a conference with the parties before the entry of a scheduling order in these circumstances.

H. Limitations on discovery.

1. The limitations contained in Fed. R. Civ. P. 26(b), 30, and 33 will apply except as indicated below.
2. Depositions.
 - a) The maximum number of depositions by each party will not exceed (Number).
 - b) Depositions will not exceed (Number) hours as to any deponent.
 - c) Depositions will not exceed (Number) hours as to non-party deponents, and will not exceed (Number) hours as to party deponents.²
3. The maximum number of interrogatories posed by each party will not exceed (Number).
4. The maximum number of requests for admissions posed by each party will not exceed (Number).
5. Other discovery limitations: (Insert other limitations).

IV. **Pretrial Motions.**

- A. Are there preliminary motions as to jurisdiction, venue, arbitration, and/or statutes of limitation that should be filed within 60 days? — Yes — No.
(If yes, please explain).
- B. Motions will be served and filed within the times specified in the applicable rules, except as follows:

² Unless otherwise specified, the Court will consider corporate officer, Rule 30(b)(6) witness, and expert witness depositions to be subject to the time limitation applicable to party depositions.

1. Motions to amend pleadings or add parties will be filed not later than (Date). Thereafter, a party must seek leave of the Court to modify this deadline. See Civil Rule 16(b)(3)(A) and (4).
2. Motions under the discovery rules will be filed not later than (Date).
3. Dispositive motions (including motions for summary judgment) will be filed not later than (Date).
4. Motions as to the qualification of experts and Daubert motions shall be filed and served not later than (Date).

V. Other Provisions.

- A. The parties ☐ do ☐ do not request a conference with the Court before the entry of a scheduling order. If the parties *do* request a conference prior to entry of the order, please explain why a conference is requested:
(Explanation).
- B. The parties ☐ do ☐ do not consent to trial before a Magistrate Judge.
- C. The disclosure requirements of Fed. R. Civ. P. 7.1:
 1. ☐ Have been complied with.
 2. ☐ Compliance will be accomplished on or before (Date).
 3. ☐ Rule 7.1 is not applicable.
- D. Early settlement/alternative dispute resolution.
 1. Do the parties request immediate assistance by way of a settlement conference with another judicial officer? ☐ Yes ☐ No. If yes, please explain: (Explanation).
 2. Do the parties wish to consider a settlement conference with a judicial officer of this court at a later date? ☐ Yes ☐ No.

VI. Trial.

- A. The case is expected to take (Number) days to try.
- B. A jury trial has been demanded: ☐ Yes ☐ No.
- C. The parties ☐ do ☐ do not request the scheduling of a trial date at this time. If a trial date is requested at this time, the parties' report shall include a minimum of three alternative dates for the start of the trial, with at least two of such proposed dates to be within 4 to 6 months from the

close of all discovery. When a trial date is established, a pretrial order shall issue.

VII. Report Form.

- A. Have counsel experienced any problem(s) in using this form?
___ Yes ___ No. If yes, please explain: (Explanation).
- B. Are there any subjects that counsel would like to see added to this form?
___ Yes ___ No. If yes, please explain: (Explanation).

Dated:

(Signature block(s) for plaintiff's attorney)
(Signature block(s) for defendant's attorney)